

EXHIBIT 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS
ANTITRUST LITIGATION

:
: Master File No. 12-md-02311
: Honorable Marianne O. Battani

[PART]

: Case No.
:
:

THIS DOCUMENT RELATES TO:
END-PAYOR ACTIONS

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**END-PAYOR PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO [DEFENDANT]**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs, through their counsel, request that [Defendant] respond to the following interrogatory within (30) days of service and thereafter supplement such interrogatory response as may be necessary to comply with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

DEFINITIONS

The following Definitions apply to these Interrogatories:

1. "Each" includes "all" and "any."
2. "Make" means motor vehicle original equipment manufacturer ("OEM").

3. “Model Name” means a particular brand of motor vehicle sold under a make by an OEM.

4. “Model Number” means an alphabetical and/or numerical code used in reference to a particular brand of motor vehicle during the research and development phase.

5. “Model Platform” refers to motor vehicle models of the same model year or different model years that share common design, engineering, production, and/or manufacturing characteristics, including but not limited to, identical automotive parts at the component or sub-component level.

6. “Model Year” refers to the first year that a motor vehicle model is officially available for purchase in a specific market. Note that some models may be unofficially available for purchase in specific markets before their model year.

7. The use of the singular herein also includes the plural, the masculine, and the feminine, as appropriate in the context. The use of any tense of any verb shall include also within its meaning all other tenses of the verb.

INSTRUCTIONS

1. If a response to the interrogatory, or part thereof, is withheld on a claim of privilege, identify the privilege asserted and state in detail sufficient facts to establish the basis for the privilege. State whether the information requested has ever been provided to any governmental entity or any other

party other than Defendant or its attorneys.

2. If any information requested is withheld based on a claim that such information constitutes attorney work-product, please provide all the information described in Instruction No. 1 and identify the litigation in connection with which the information was obtained and/or prepared.

3. The obligation to respond to this interrogatory is continuing pursuant to Rule 26(e) of the Federal Rules of Civil Procedure. If at any time after responding to this interrogatory you discover additional information that will make your response to this interrogatory more complete or correct, supplement or amend your responses in accordance with the Rule.

4. If you respond to the interrogatory by reference to business records pursuant to Federal Rule of Civil Procedure 33(d), identify such records by Bates number and the name of the employee certifying the documents as business records for purposes of answering the interrogatory.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each vehicle model, including but not limited to Make, Model Name, Model Number, Model Platform, and Model Year, affected by the collusion or coordination described in your plea agreement with the Antitrust Division of the United States Department of Justice (Ex. 1).

RESPONSE:

Date: September __, 2014

/s/ Steven N. Williams

Frank C. Damrell

Steven N. Williams

Adam J. Zapala

Elizabeth Tran

**COTCHETT, PITRE & McCARTHY,
LLP**

San Francisco Airport Office Center

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Facsimile: (650) 697-0577

fdamrell@cpmlegal.com

swilliams@cpmlegal.com

azapala@cpmlegal.com

etran@cpmlegal.com

/s/ Hollis Salzman

Hollis Salzman

Bernard Persky

William V. Reiss

**ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.**

601 Lexington Avenue, Suite 3400

New York, NY 10022

Telephone: (212) 980-7400

Facsimile: (212) 980-7499

hsalzman@rkmc.com

bpersky@rkmc.com

wvreiss@rkmc.com

/s/ Marc. M. Seltzer

Marc M. Seltzer

Steven G. Sklaver

SUSMAN GODFREY L.L.P.

1901 Avenue of the Stars, Suite 950

Los Angeles, CA 90067-6029

Telephone: (310) 789-3100

Facsimile: (310) 789-3150

mseltzer@susmangodfrey.com

ssklaver@susmangodfrey.com

Terrell W. Oxford

Warren T. Burns

SUSMAN GODFREY L.L.P.

901 Main Street, Suite 5100

Dallas, Texas 75202

Telephone: (214) 754-1900

Facsimile: (214) 754-1933

toxford@susmangodfrey.com

wburns@susmangodfrey.com

*Interim Co-Lead Class Counsel for the
Proposed End-Payor Plaintiffs Classes*